

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN/GREENBELT DIVISION

ONLINE RESOURCES CORP.,

Plaintiff,

v.

AUTOSCRIBE CORPORATION and
POLLIN PATENT LICENSING, LLC,

Defendants.

Case No. 8:11-cv-1801-JFM

AGREED MOTION FOR ENTRY OF REVISED STIPULATED PROTECTIVE ORDER

Consistent with the Court's January 9, 2012 Order [Dkt. No. 48], Defendants Autoscribe Corporation and Pollin Patent Licensing, LLC (collectively, "Autoscribe") move the Court for entry of the revised Stipulated Protective Order (attached hereto as Exhibit A), which is consistent with all provisions required by Local Rule 104.13. In support of this motion, Autoscribe states as follows:

1. Plaintiff and Defendants contemplate that discovery in this case will involve the disclosure of confidential and highly confidential information, including but not limited to current or future business, legal or technical trade secrets, strategies, communications and plans as well as commercially sensitive information and non-public business and financial data. The holders of such confidential and highly confidential information include the named parties to this case, and may also include third parties who may be subpoenaed to provide documents and/or deposition testimony.

2. The disclosure of such confidential and highly confidential information in any manner other than provided in the revised Stipulated Protective Order will pose a significant risk of injury to the legitimate business interests of the disclosing party. Accordingly, the revised

Stipulated Protective Order submitted with this Motion is necessary to protect the legitimate business interests of the disclosing parties in such confidential and highly confidential information.

3. Good cause exists for entry of the revised Stipulated Protective Order.

4. All parties to this litigation have agreed to this Motion and to the terms of the revised Stipulated Protective Order attached hereto as **Exhibit A**.

WHEREFORE, Autoscribe respectfully requests that the Court grant this Agreed Motion for Entry of the Revised Stipulated Protective Order attached hereto as Exhibit A, and that said Stipulated Protective Order be entered by the Court.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 17, 2012 the foregoing

AGREED MOTION FOR ENTRY OF REVISED STIPULATED PROTECTIVE ORDER

was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record.

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I certify that all parties in this case are represented by counsel who are CM/ECF participants.

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